

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF TENNESSEE  
SOUTHERN DIVISION**

---

**IN RE:       MICHAEL LEE TULLIS AND  
              JULIE MICHELLE TULLIS,  
              Debtors**

---

**Case No. 1:16-BK-10740-SDR  
Chapter 13**

**OBJECTION TO CONFIRMATION**

Comes now U.S. Bank Trust, N.A., as Trustee for LSF6 Bermuda MRA Trust, a secured creditor of the above-named Debtor(s), and a party in these proceedings (hereinafter "Movant"), by and through its attorneys, Wilson & Associates, P.L.L.C., for its Objection to Confirmation of the Chapter 13 plan proposed herein by the Debtor(s), Michael Lee Tullis, and Julie Michelle Tullis, states:

1.       It is the servicer of a Deed of Trust and Note covering the real property municipally known as 828 Hardin Drive, Chattanooga, TN 37412. This property is listed in the Debtor's schedules and statements as their principal residence.

2.       Pursuant to 11 U.S.C. §1324, Movant objects to said Chapter 13 plan because the Debtor's plan provides for arrearages of \$5,230.00. However, the estimated arrears in the Proof of Claim are in the amount of \$14,745.45, pending approval. Therefore, Movant is not adequately protected.

3.       Therefore, the plan does not meet all of the requirements for confirmation.

WHEREFORE, Movant objects to confirmation of the Chapter 13 plan proposed herein by the Debtor(s), and prays that this Court deny such confirmation, and for all other just and proper relief.

Respectfully Submitted,

/s/Joel W. Giddens

Joel W. Giddens (016700)

Brandon D. Sizemore (027808)

Michael G. Clifford (028691)

Michael N. Wennerlund (031332)

320 North Cedar Bluff Road, Suite 240

Knoxville, Tennessee 37923

(865) 558-5688

Attorneys for Movant

**CERTIFICATE OF SERVICE**

On 04/05/16, a copy of the foregoing Objection to Confirmation was served through United States Mail, postage prepaid, or electronically through the electronic case filing system (ECF) upon:

Kenneth C. Rannick (ECF)  
Attorney at Law  
4416 Brainerd Road  
Chattanooga, TN 37411

Michael Lee Tullis (U.S. Mail)  
Julie Michelle Tullis  
Debtors  
828 Hardin Drive  
Chattanooga, TN 37412

Kara L. West (ECF)  
Trustee  
P.O. Box 511  
Chattanooga, TN 37401

Office of the United States Trustee (ECF)  
Assistant U.S. Trustee  
31 East Eleventh Street, Fourth Floor  
Knoxville, TN 37402

/s/Joel W. Giddens

Joel W. Giddens (016700)

Michael G. Clifford (028691)

Michael N. Wennerlund (031332)

Brandon D. Sizemore (027808)